



# Baltimore County Department of Planning Language Access Plan For Limited English Proficiency

## Introduction

### **Language Access Plan**

This Language Access Plan (LAP) has been prepared to address Baltimore County Department of Planning's (BCDOP) responsibilities as a recipient of federal Community Development Block Grant (CDBG) funds, as it relates to the needs of individuals with limited English language skills. The Division of Neighborhood Improvement (NI) is responsible for the administration of the CDBG program. Baltimore County is committed to providing meaningful access to all individuals needing and/or seeking to participate in any of its CDBG funded activities by developing and implementing a Language Access Plan. The LAP activities will assist Baltimore County in meeting its goal of Affirmatively Furthering Fair Housing which in general is using federal financial assistance and other program resources to overcome barriers to fair housing choice. This LAP is also meant to assist BCDOP in expanding social and community opportunities for its extremely low to moderate-income residents.

### **I. Purpose**

The purpose of this Language Access Plan (LAP Plan) is to provide assurances and demonstrate that clients of Baltimore County Department of Planning are being provided meaningful access to program information, benefits, and services although the customers may be limited in their ability to speak, read, write or understand English. This plan will be reviewed and updated as needed to refresh the assurances contained within the plan and address any changes in methods.

It is understood that the Baltimore County Department of Planning–Division of Neighborhood Improvement is charged with the duty to ensure the entire Department of Planning is in compliance with all relevant federal requirements involving applicants/recipients of program information, benefits and services who have Limited English Proficiency (LEP).

<http://www.baltimorecountymd.gov/Agencies/planning/publicationsmaps/index.html>

As a recipient of federal funding, the Baltimore County Department of Planning must take reasonable steps to ensure meaningful access to the information and services it provides.

#### Four Factor Analyses

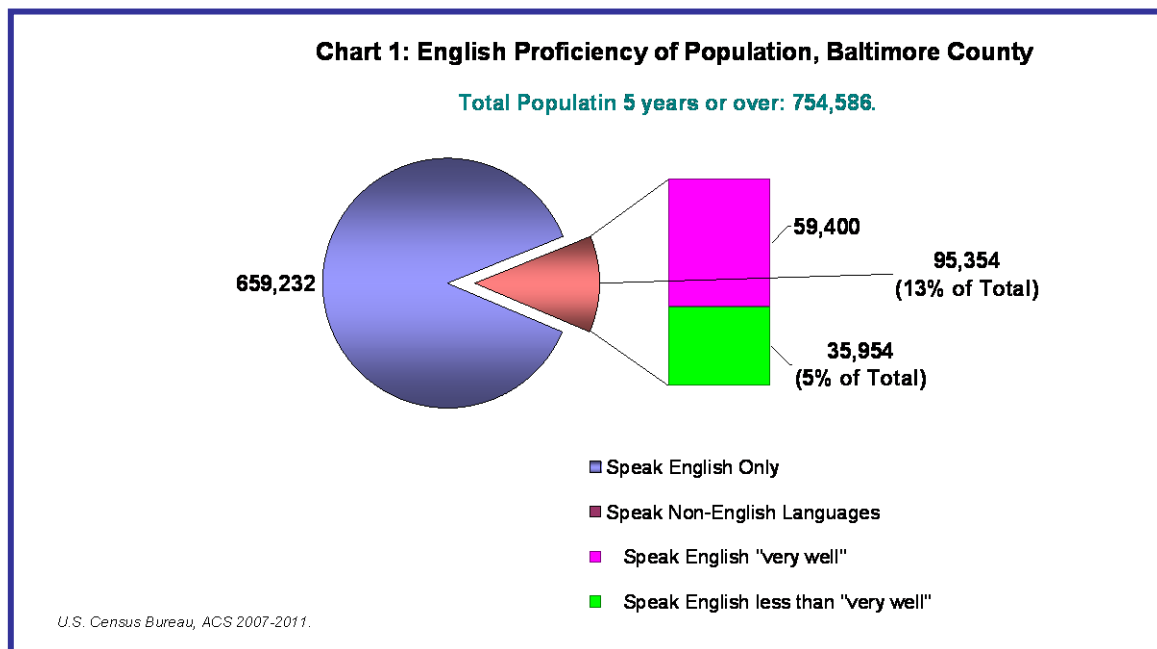
As directed by HUD, in determining “reasonable steps” there are four factors to be considered:

1. The number and proportion of LEP persons in the eligible service area;
2. The frequency with which LEP persons come in contact with the program;
3. The importance of the service provided by the program; and
4. The resources available to the recipient.

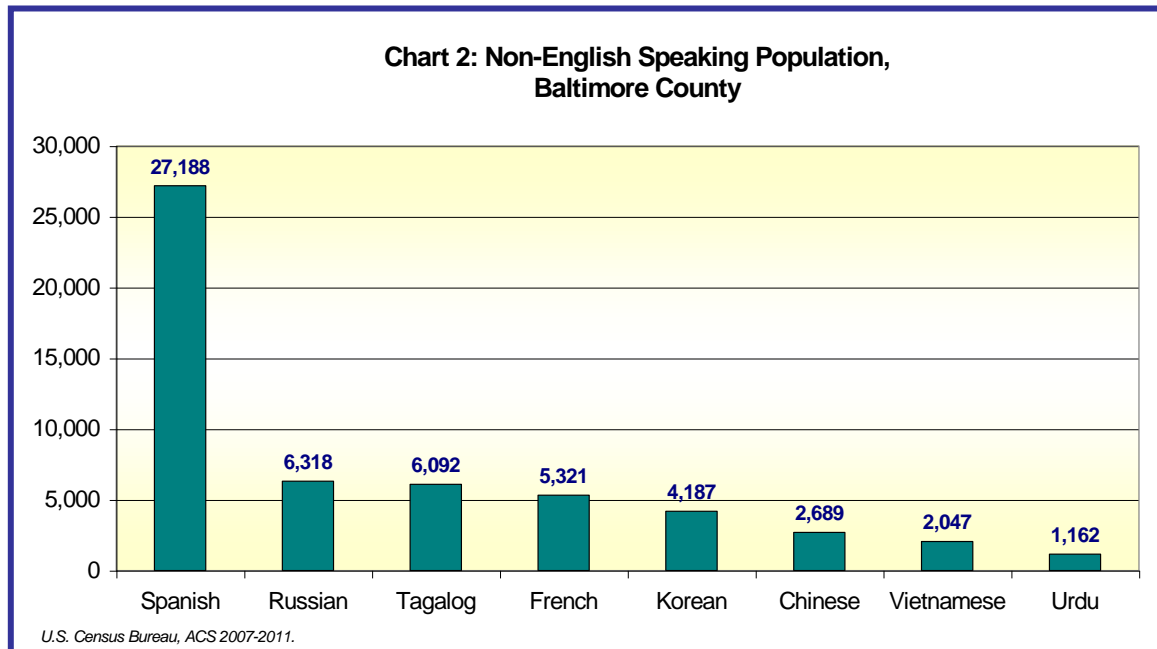
The following is an assessment of need in Baltimore County as it pertains to the mission of the Baltimore County Department of Planning.

#### *1. The number and proportion of LEP persons served or encountered in the eligible service area*

<sup>1</sup>According to the “Language Spoken At Home by Ability to Speak English for the Population 5 Years and Over” US Census Bureau American Fact Finder– 2011 American Community Survey, there are approximately 754,586 persons in that category residing in Baltimore County and approximately 29,002 speak English “less than very well.” Languages other than English that are most likely to be encountered by employees of the BCDOP offices and the approximate number of those persons that speak English less than very well are Spanish 11,411, Russian 3,808, Chinese 2,689, Urdu 2,331, African Languages 2319, Korean 2,065, Tagalog 1,750 Vietnamese 1,443 and French 1,186. All numbers and percentages are reasonable approximates.



<sup>1</sup> U.S. Census Bureau, American Fact Finder B16001



*Population maps are available on pages 11 thru 19*

The BCDOP will periodically monitor the LEP population of those served by its various programs by review of the quarterly reports submitted by grantees/services providers. If it is determined through review of the reports that other LEP language groups are seeking benefits/services or are potentially eligible to receive benefits/services; BCDOP will make the necessary changes on an as needed basis.

## ***2. The frequency with which LEP persons come in contact with the program***

Though currently comparatively small, the County's growing LEP population increases the probability of an increase in LEP persons contact with the BCDOP in the future. However, due to the current size of the LEP population and the nature of services directly provided by the BCDOP, LEP interaction/contact is generally limited to a few programs within the Department of Planning. A January 2013 survey of BCDOP staff revealed that requests for information/assistance from LEP individuals or families to BCDOP are also minimal.

## ***3. The importance of the service provided by the program***

The direct services and grants BCDOP provides to the public enables the agency to assist the County in affirmatively furthering fair housing as well as to assist residents in activities that vary from acquiring affordable housing to modifying existing housing in order to age in place. BCDOP uses Federal funds to operate its Housing Rehabilitation Program, Housing Accessibility Modification Program and Lead Remediation Program. The agency also awards federal grant funds to non-profit organizations and other county agencies that provide direct services to very low, low and moderate income households and individuals including homeless persons; persons at risk of becoming homeless; first-time homebuyers; persons with disabilities; children; elderly and affordable housing development.

Further, the agency conducts compulsory activities such as applications and interviews prior to a clients' participation in the aforementioned programs.

The BCDOP does provide opportunities for the public to comment on the use of Federal funds in four major areas: a Consolidated Plan which helps shape the five-year priorities of the County as we assist and work with Baltimore County citizens to meet the needs of our neighborhoods; an annual Action Plan that shows how we plan to implement priorities in the coming year; the Analysis of Impediments to Fair Housing Choice that is a tool to assist the County in identifying any barriers to its effort to provide services and activities in a nondiscriminatory manner and to affirmatively further fair housing; the Consolidated Annual Performance and Evaluation Report that provides information to the public on the activities funded in a fiscal year and publication of a Development Guide for the development of affordable housing in Baltimore County.

The impacts of these plans and activities resulting from these actions do have a consequence on all residents and efforts are made to encourage an understanding of the process and opportunities to comment. Affirmative efforts are made to make the planning process as inclusive as possible.

BCDOP will ensure opportunities for LEP individuals to participate in the affordable housing development process by way of written notifications to various community-based organizations that directly serve LEP families and individuals.

#### **4. The resources available to the recipient**

Because the LEP population in the area is comparatively small at this time and the cost of translating the required program applications, is relatively low, the BCDOP has determined that full translation of housing rehabilitation and lead abatement applications is appropriate and will be translated on an as needed basis.

BCDOP has contracted with ***Language Line Services***; a professional language interpreting company to provide language interpretation services. Services are provided via telephone. Written document translation services will be provided by access to the State of Maryland's contracted services with ***Schreiber Translations, Inc. (STI)***. Schreiber Translations, Inc.<sup>2</sup> "offers precise, accurate and certified translations in any discipline, of any type of material from English into any language and any language into English." Additionally, BCDOP awards funds to local community-based organizations that provide housing counseling, immigrant outreach and domestic violence counseling services to Spanish speaking LEP clients.

BCDOP duplicates HUD "***know Your Rights***" publications and makes those publications available and easily accessible in the reception areas of BCDOP's first and second floor offices.

BCDOP has established a list of staff members that fluently speak/write foreign languages such as French, Portuguese, Chinese and Greek who voluntarily serve as on-call interpreters. Included on the list of volunteers is a staff member that provides American Standard Sign language. BCDOP continues to seek staff volunteers that fluently speak/write Spanish, Russian, Korean, Vietnamese and Tagalog

#### **Meeting the Requirements: The BCDOP Language Access Plan for Limited English Proficiency**

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<sup>2</sup> [www.schreibernet.com](http://www.schreibernet.com)

Providing meaningful access to services to the diverse population within Baltimore County is important and therefore the BCDOP has completed the following assessment and plan for providing language assistance to the LEP population it serves.

All language access activities detailed below will be coordinated by the Division of Neighborhood Improvement in collaboration with Baltimore County Human Resources and BCDOP executive staff.

### **Identifying LEP Individuals Who Need Language Assistance**

Baltimore County Department of Planning (BCDOP) staff that has direct contact with the public will utilize the Census Bureau's "What Language Do You Speak?" card which is translated into 38 different languages upon first encountering an LEP individual. The card is used by government and non-government agencies to identify the primary language of Limited English Proficient individuals during face to face contacts. The Census Bureau's Language Identification card can be downloaded for free of charge at [www.lep.gov/ISpeakCards2004.pdf](http://www.lep.gov/ISpeakCards2004.pdf). Enlargements of the "What Language Do You Speak?" cards will be conspicuously posted in the reception areas of BCDOP offices.

### **Language Assistance Measures**

Language assistance will be provided for LEP individuals through the translation of vital key materials, as well as through oral language interpretation when necessary.

#### **Translation of written materials**

Translation of all BCDOP plans and materials is not possible due to cost restrictions and current population levels do not warrant such translations.

**1. BCDOP Web Site** – The free service, powered by Google Translate, allows users to choose from English, Spanish, Russian, Arabic, French, and Chinese translations. The translation service is available by clicking the link at the bottom right of each page of the BCDOP web site.

**2. Key Documents** – An Executive Summary for the following key documents will be made available in Spanish on an as needed basis:

- (a) The Consolidated Plan (PDF) for 2012–2016
- (b) 2013 Action Plan (final)
- (c) Development Guide
- (d) Other documents as necessary

Applications for the following services will be made available in Spanish, French, Russian, Korean, Tagalog Chinese, Urdu and Vietnamese *when necessary*

- (a) Application for Housing Rehabilitation
- (b) Application for Housing Modification
- (c) Application for Lead Grant Funds

**3. Outreach Materials** – Russian, Korean, Spanish, Chinese, Urdu and Tagalog–language outreach materials will be utilized when necessary and possible. The Division of Neighborhood Improvement will keep a list of such materials. Current BCDOP outreach materials will not be translated at this time, however the BCDOP will honor requests to provide key outreach materials in Spanish as new materials are developed, on an as needed basis.

## Oral Language Services

The BCDOP will provide language interpretation services to Russian, Korean, Spanish, Chinese, Urdu and Tagalog –speaking LEP individuals. In order to provide these services, BCDOP will do the following:

- ***Maintain a list of the points of contact where a LEP person interacts with BCDOP.*** At this time the key points of contact for LEP persons are the front-desk receptionists, Homeless Services, Housing Rehabilitation, Housing Accessibility Modification Disability and Lead Remediation Programs. As interaction with LEP persons increases, additional points of contact will be identified.
- ***Identify, by language spoken, employees who fluently speak and/or write a language other than English.*** In order to ensure equal access to program information and services and improve client communication, a diverse group of multi-lingual BCDOP staff have established the “ALL-TALK Language Bank” to serve as volunteer on-call interpreters. An inventory of staff’s foreign and Sign language capabilities has been established and will be maintained by the BCDOP
- ***Provide direct access to professional sources that will provide oral language services*** – BCDOP has contracted with Language Line Services to provide oral interpretation services.
- ***Provide competent translation of key documents***– BCDOP has arranged (via the State of Maryland) to provide key document translation services to LEP clients. Services will be provided on an as needed basis by Schreiber Translations, Inc
- ***Document the occurrences and cost of these services and apply those costs to HUD eligible activity.***

## Staff training

In order to facilitate meaningful access to information and services for LEP individuals, BCDOP employees (including those that do not interact directly/regularly with LEP clients) will participate in periodic sensitivity discussions. Such discussions will be conducted to ensure that all staff is fully aware of LEP policies and procedures and are effectively able to work in person and/or by telephone with LEP individuals.

Since Spanish is the largest representative Limited English Proficiency language in Baltimore County, BCDOP in cooperation with Baltimore County’s Department of Human Resources is offering a six-week “Command Spanish for Office Personnel” course, free of charge to its entire staff. The classes will be taught by a Baltimore County Community College instructor. Enrollment is voluntary and expected to begin April 18, 2013 and end May 23, 2013. Continuation of the classes on an annual basis is contingent upon the availability of funding.

## Providing Notice of Available Language Service to LEP Persons

The Baltimore County Department of Planning will establish the following methods to inform Spanish-speaking LEP individuals and supporting organizations, as well as the general public, of available free-of-charge LEP services.

- ***Posting signs*** – An “Interpretation Services Available” sign will be conspicuously posted in the BCDOP 1<sup>st</sup> floor and 2<sup>nd</sup> floor reception areas to notify LEP individuals of available translation and interpreting services.
- ***Outreach documents*** – Key BCDOP program outreach documents will include a notice that some language assistance services are available. This notice will be listed in both Spanish and English.

- ***Community Organizations*** – The BCDOP will advise groups to whom BCDOP awards federal funds of their (the groups) obligation to provide meaningful access to Limited English Proficiency persons they serve or potentially may serve and to document such service for reporting.
- ***Public Notices*** – The BCDOP may periodically issue notices to local Spanish–language newspapers in the Baltimore County Area about available LEP services.

In the future, the BCDOP may consider additional notification methods, including:

- Radio announcements – Provide notices on area Spanish–language radio stations about available language assistance services and how to access them.
- Community presentations – Provide notices in Spanish to community associations.

### **Monitoring and Updating the LEP Plan**

The BCDOP Grants Administration will continue to monitor services to and the number of LEP population via review of quarterly reporting documents.

Periodic reviews of this LAP may be conducted by BCDOP executive staff and when necessary coincide with the public review of the Annual Action Plan and the Consolidated Annual Performance and Evaluation Report. BCDOP will document LEP services provided and will make this information available during the review process.

### **LEP complaint processing**

The BCDOP will establish the following complaint procedure and process that meets Title VI requirements.

### ***Discrimination Policy***

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin in programs or activities receiving federal financial assistance. Presidential Executive Order 12898 addresses Environmental Justice in minority and low–income populations. Presidential Executive Order 13166 addresses providing equal access to services and benefits to those individuals with Limited English Proficiency (LEP). The rights of women, the elderly and the disabled are protected under related statutes. These Presidential Executive Orders and the related statutes fall under the umbrella of Title VI.

Title VI prohibits the following actions for recipients of federal assistance. Recipients (hereinafter sometimes referred to as Recipient, Recipients, Sub recipients or Sub recipient) of federal assistance (directly or through grant/contractual means), on the grounds of race, color, or national origin shall not:

1. Deny a person the chance to participate as a member of a planning or advisory body that is an integral part of the program.
2. Provide a service or benefit to an individual that is inferior (either in quantity or quality) to that provided to others in the program.
3. Provide an individual with a service or benefit in a manner different from others under the program.
4. Address an individual in a manner that denotes inferiority because of race, color, or national origin.
5. Subject an individual to segregation in any manner related to the receipt of services or benefits under the program.
6. Subject an individual to separate treatment in any manner related to receiving services or benefits under the program.

7. Restrict an individual in any way in the receipt of any advantage or privilege enjoyed by others under the program.
8. Require different standards or conditions as prerequisites for accepting an individual into a program.
9. Deny an individual any service or benefit provided under the program.
10. Use criteria or methods of administration which have the effect of subjecting individuals to discrimination or operate to defeat or substantially impair the accomplishment of the objectives of the program.
11. Permit discriminatory activity in a facility built in whole or in part with federal funds.
12. Fail to provide service or information in a language other than English when significant numbers of potential or actual beneficiaries are of limited English speaking ability.
13. Fail to advise the population eligible to be served or benefited by the program of the existence of the program.
14. Subject an individual to discriminatory employment practices under any federally funded program whose object is to provide employment.
15. Locate a facility in any way that would limit or impede access to a federally funded service or benefit.

### ***Complaint Procedure***

As a recipient of federal financial assistance, Baltimore County Department of Planning (BCDOP) will implement the following Title VI complaint procedure:

**1. Submit complaint:** Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation, from the Baltimore County Department of Planning administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. Such complaint must be filed within 60 calendar days after the date the person believes the discrimination occurred.

Submit written complaints to:

Director,  
Department of Planning  
105 W. Chesapeake Avenue, Suite 101  
Towson, Maryland 21204  
Phone: 410-887-3211  
Email: [planning@baltimorecountymd.gov](mailto:planning@baltimorecountymd.gov)

Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as detailed as possible the facts and circumstances surrounding the claimed discrimination and shall include the following information:

- Name, address, and phone number of the Complainant.
- A written statement of the complaint, including the following details:

(a) Basis of complaint (i.e., race, color, national origin or language, disability, religion, familial status, or retaliation).

(b) The nature of the incident that led the complainant to feel discrimination was a factor.

(c) A detailed explanation of the alleged discriminatory act(s).

(d) The date or dates on which the alleged discriminatory event or events occurred.



(e) If applicable, name(s) of alleged discriminating person(s).

- Other agencies (state, local or Federal) where the complaint is also being filed (optional).
- Complainant's signature and date.

**2. Review and Response:** Upon receipt of the Complaint, the BCDOP Director shall appoint one or more staff review officers (from a division different from the one named by complainants), as appropriate, to evaluate and investigate the complaint. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the Complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the BCDOP's processes relative to Title VI, as appropriate.

The staff review officer(s) shall forward their recommendations to the BCDOP Director, for concurrence. If the BCDOP concurs, the BCDOP Director shall issue the BCDOP's written response to the Complainant. This response shall be issued no later than 30 calendar days after the date the BCDOP Director received the Complaint. If more time is required, the BCDOP Director shall notify the complainant of the estimated time-frame for completing the review.

**3. Appeal:** The Complainant may appeal the BCDOP Director's response to the Complaint by submitting a written appeal to the BCDOP Director no later than 15 calendar days after receipt of the BCDOP Director's written response. A response to any appeals will be issued by the BCDOP Director within 15 days of receipt.

*If the individual/s still believes the complaint has not been resolved, he/she/they may request a decision from the:*

Department of Human Resources  
Director/Deputy Director  
308 Allegheny Avenue, Towson, Maryland 21204  
Phone: 410-887-3135  
Email: [ggay@baltimorecountymd.gov](mailto:ggay@baltimorecountymd.gov)

*If the individual/s still believes the complaint has not been resolved, he/she/they may request a decision from the:*

Human Relations Commission  
Executive Director  
Drumcastle Government Center  
6401 York Road, Suite 1013, Baltimore, Maryland 21212  
Telephone: 410-887-5917 TDD: 410-339-7520 Fax: 410-887-6079  
E-mail: [bchrc@baltimorecountymd.gov](mailto:bchrc@baltimorecountymd.gov)

*If the individual/s still believes the complaint has not been resolved, he/she may request a decision from the:*

State of Maryland Civil Rights Commission  
6 Saint Paul Street, Baltimore, Maryland 21202  
Phone: 410-767-8600  
Toll Free: 1-800-637-6247, Fax: 410-333-1841 Telephone Text (TTY) 410-333-1737

***If the individual/s still believes the complaint has not been resolved, he/she may request a decision from the:***

U.S. Justice Department

950 Pennsylvania Avenue, Washington DC, 20530-0001

Phone: 1-202-514-2000

***The above listed order is suggested and is by no means required. Complainants are free to file discrimination complaints in whatever orders they so choose.***

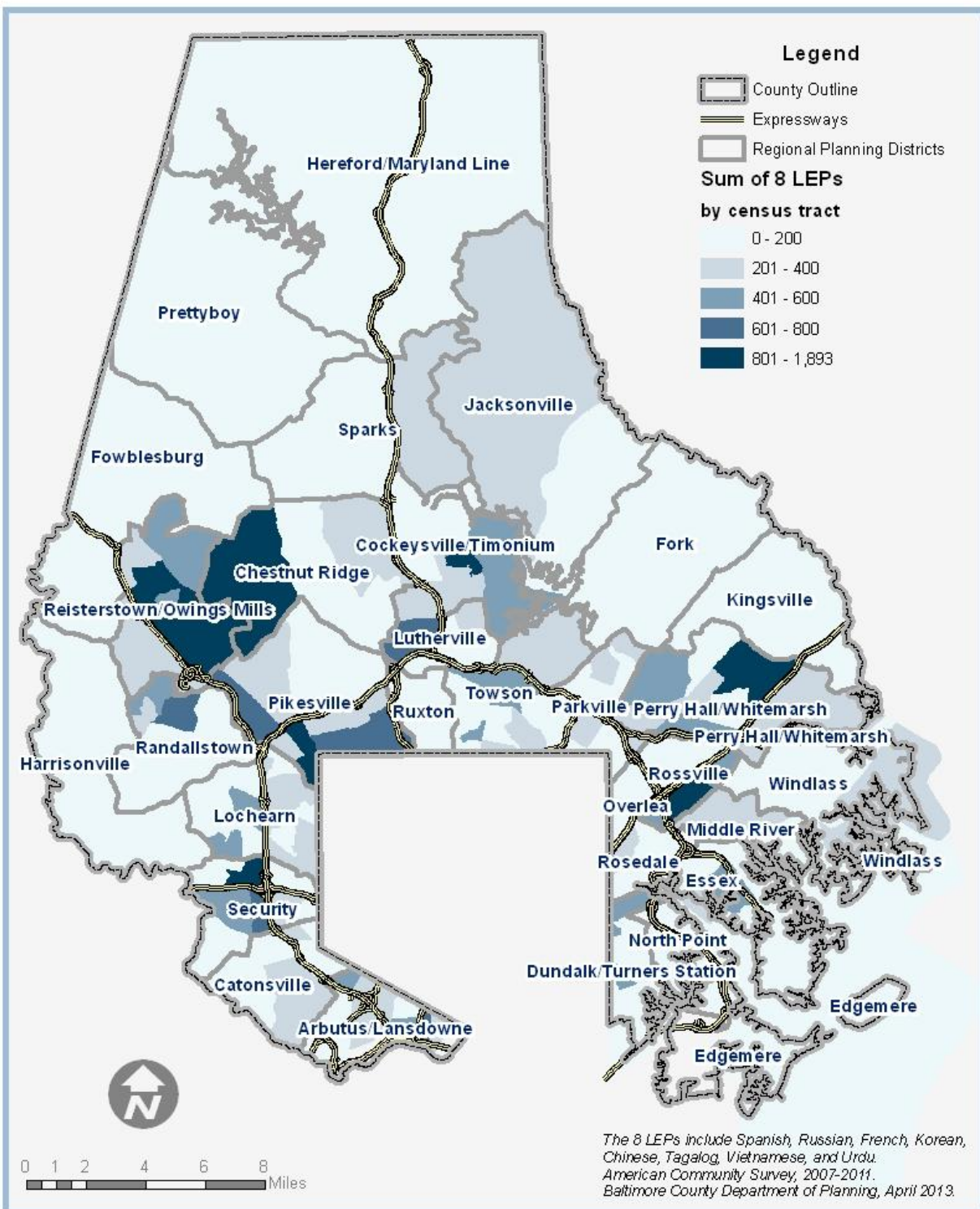
The intent of this Language Access Plan (LAP) is to ensure access to the planning process, program benefits and other related activities where it is determined that a substantial number of residents in the Baltimore County Region does not speak or read English proficiently. Interpretation at meetings or events will be provided to the degree that funding permits based on current laws and regulations.

## Laws and Policies Guiding Language Access Plans for Limited English Proficiency

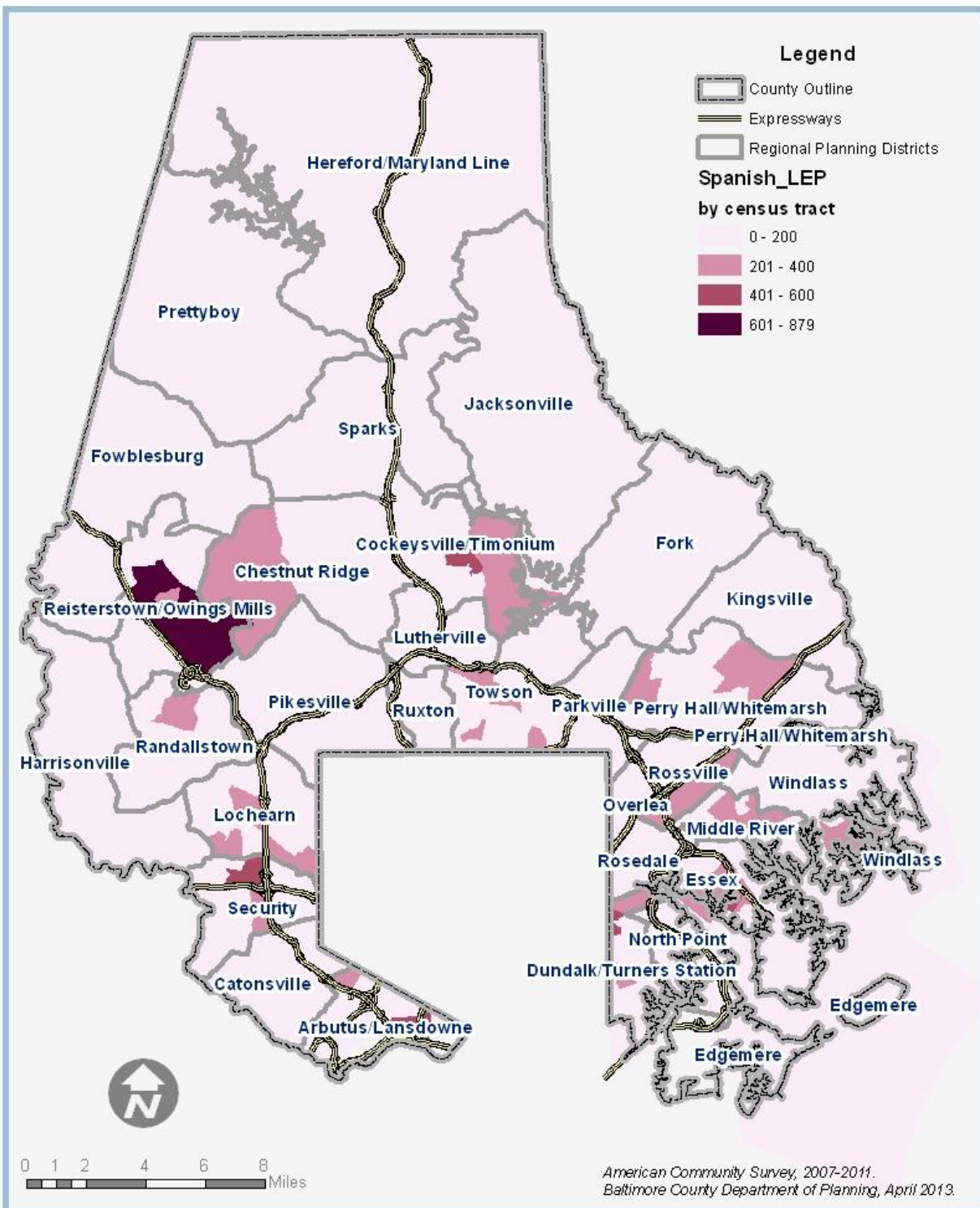
Title VI of the Civil Rights Act of 1964	Limited English Proficiency Executive Order 13166	MD Senate Bill 265 – Equal Access to Public Services for Individuals with Limited English Proficiency
Federal law	Federal policy	State law
Enacted in 1964	Signed August 2000	Effective July 2002
Considers all persons	Considers eligible population	Considers eligible population
Contains monitoring and oversight compliance review requirements	Contains monitoring and oversight requirements	Contains monitoring requirements and a timeline for implementation. BCDOP – 2012
Factor criteria is required, no numerical or percentage thresholds	Factor criteria is required, no numerical or percentage thresholds	Baltimore County Article 29 of the Baltimore County Code, 2003 bars discrimination because of race, color, creed, age, religion, sex (including harassment and pregnancy), physical or mental disability, national origin, marital status, sexual orientation, or gender identity or expression in the areas of employment, housing, public accommodations, education, or finance.
Provides protection on the basis of race, color, and national origin	Provides protection on the basis of national origin	
Focuses on eliminating discrimination in federally funded programs	Focuses on providing LEP persons with meaningful access to services using factor criteria	
Annual Accomplishment and Upcoming Goals Report to HUD	Annual Accomplishment and Upcoming Goals Report to HUD	Maryland state agencies, departments, and programs provide equal access to public services for individuals with limited English proficiency; Requires vital documents, such as applications and hearing notices, be translated into any language spoken by any LEP population that constitutes 3% of the overall population within a specified geographic area under specified circumstances.

## Baltimore County Limited English Populations

### Geographic Distribution of Limited English Population (LEP)

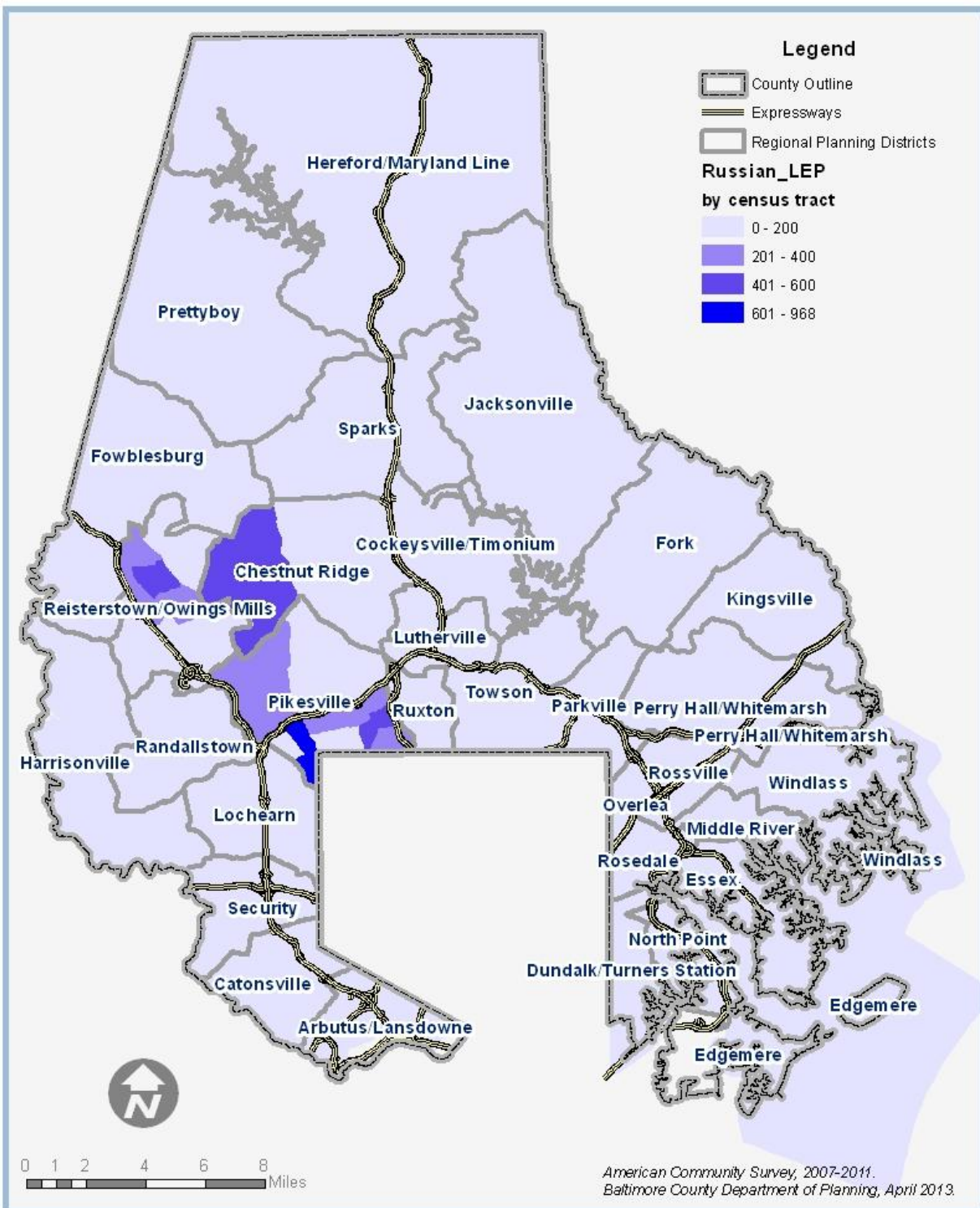


## Geographic Distribution of Limited English Population (LEP): Spanish

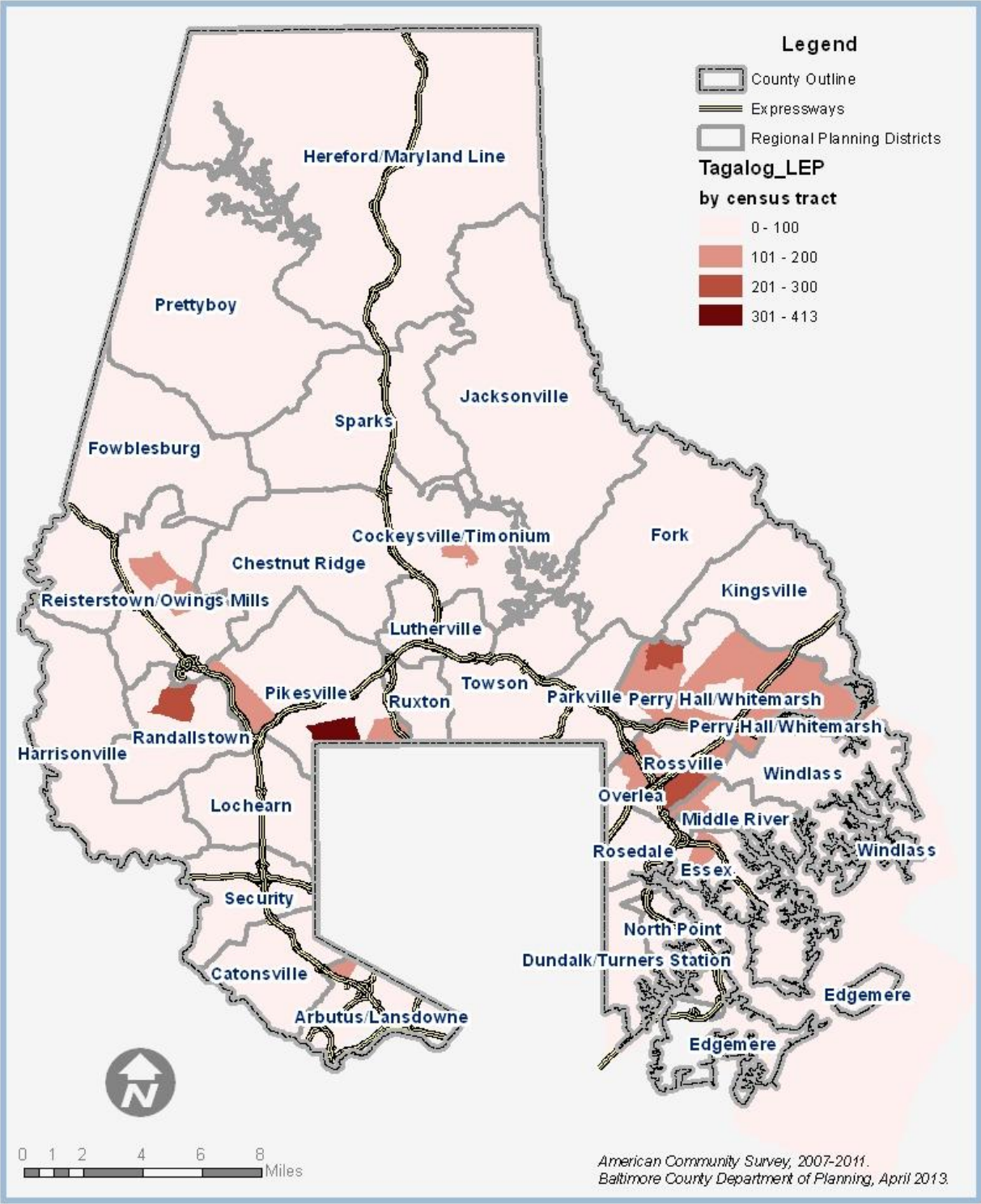




## Geographic Distribution of Limited English Population (LEP): Russian

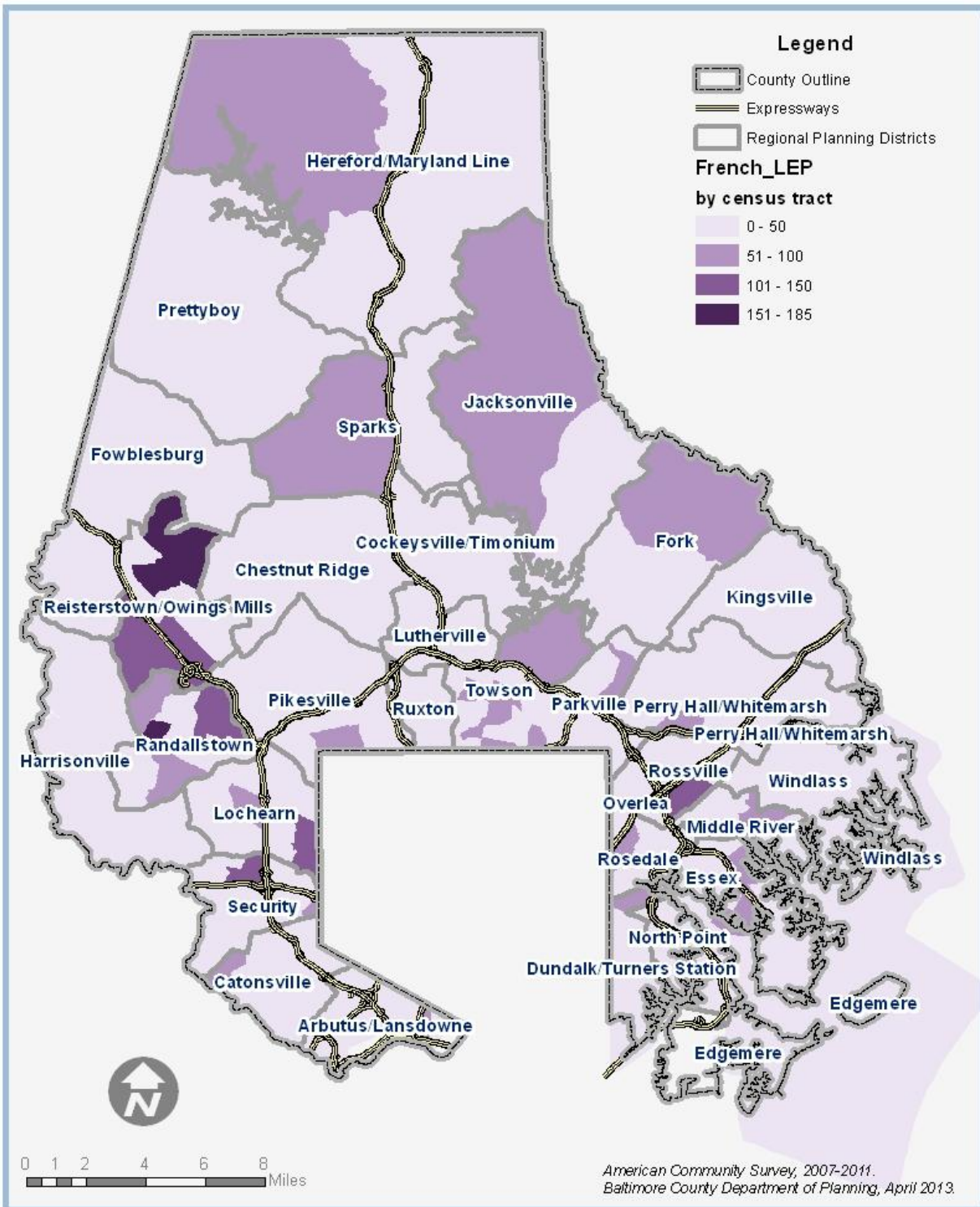


# Geographic Distribution of Limited English Population (LEP): Tagalog



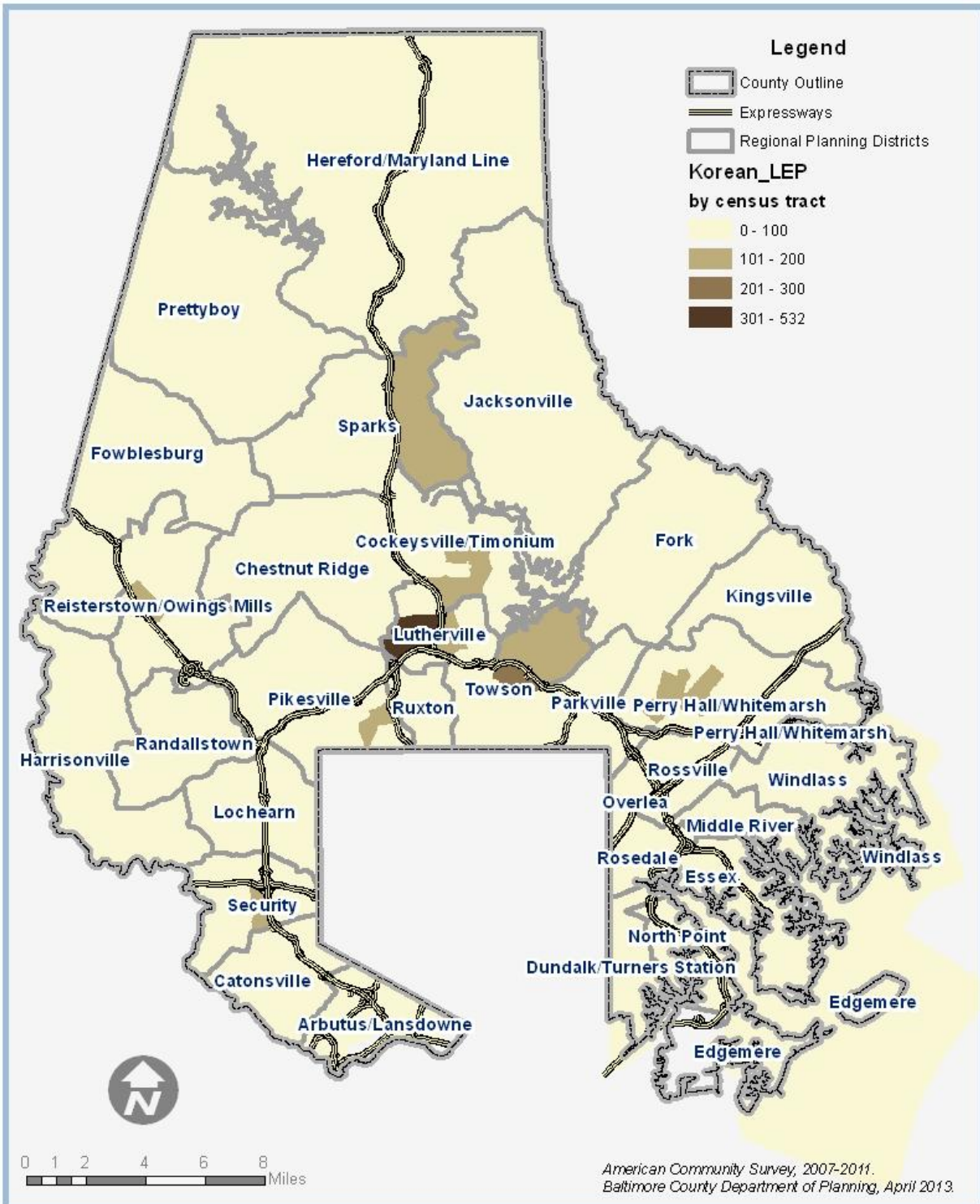


## Geographic Distribution of Limited English Population (LEP): French

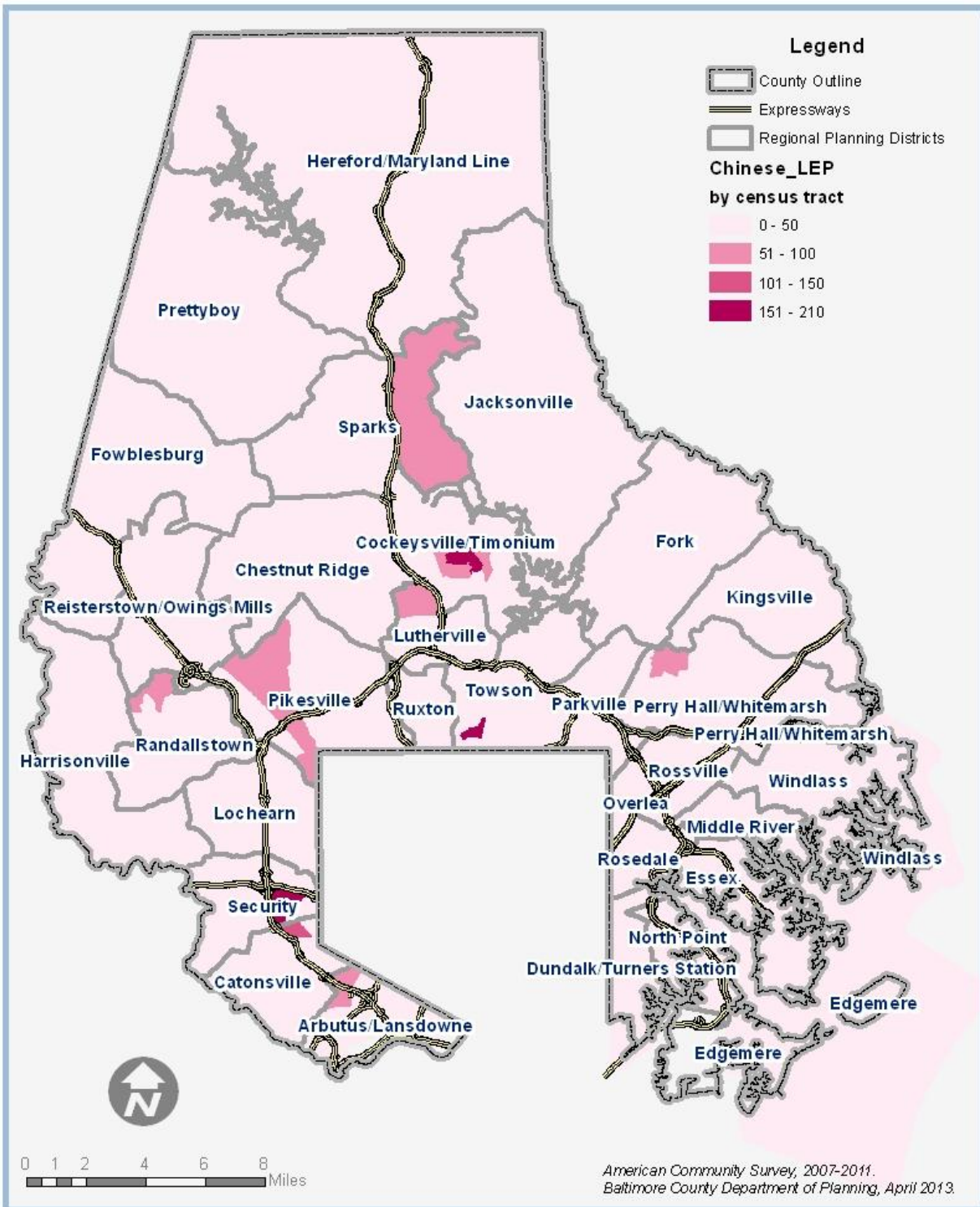




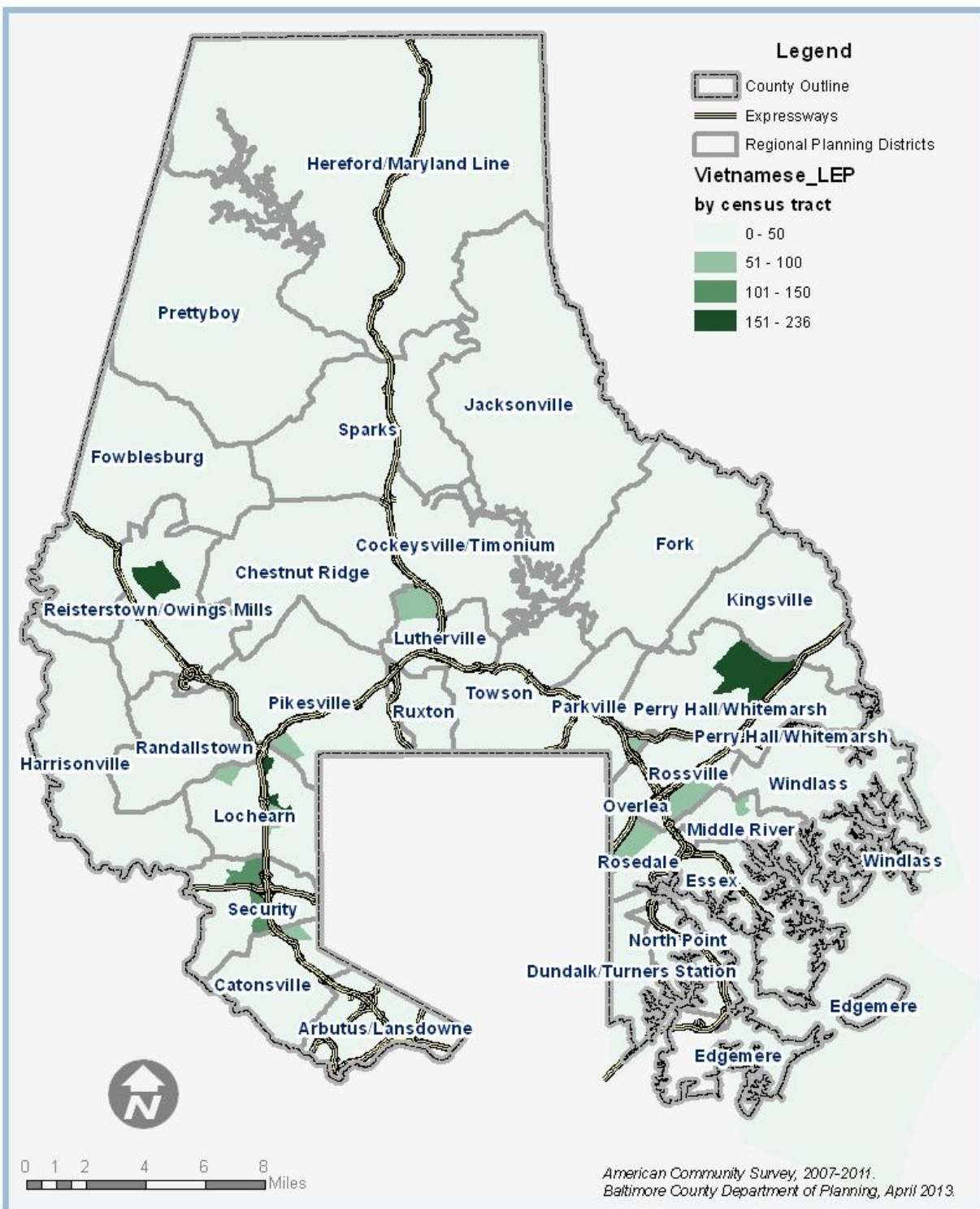
## Geographic Distribution of Limited English Population (LEP): Korean



## Geographic Distribution of Limited English Population (LEP): Chinese



## Geographic Distribution of Limited English Population (LEP): Vietnamese





## Geographic Distribution of Limited English Population (LEP): Urdu

